

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

DENISE BAKER,
*For herself and on behalf of all
similarly situated individuals,*

Plaintiff,

v.

Case No.: 1:17-cv-1160 (LMB/JFA)

NAVIENT SOLUTIONS, LLC

Defendant.

**PLAINTIFFS' CONSENT MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT, CONDITIONALLY CERTIFYING CLASS FOR PURPOSES
OF SETTLEMENT, APPOINTING CLASS COUNSEL, DIRECTING NOTICE TO THE
CLASS, AND SCHEDULING FINAL FAIRNESS HEARING**

Plaintiff Denise Baker, with the consent of Defendant Navient Solutions, LLC ("Defendant"), entered into a Settlement Agreement attached to the accompanying Memorandum in Support as Exhibit A. Pursuant to Fed. R. Civ. P. 23, and for the reasons supplied in the accompanying Memorandum, the Parties respectfully request that the Court enter a Preliminary Approval Order in the proposed form attached:

- (1) Preliminarily approving a proposed class settlement;
- (2) Scheduling a fairness hearing;
- (3) Certifying the proposed settlement class for purposes of the proposed class settlement;
- (4) Appointing class counsel; and
- (5) Approving the form and manner of notice proposed to be sent to all members of the settlement class.

Date: June 19, 2018

Respectfully submitted,

DENISE BAKER

By: /s/ William L. Downing
William L. Downing

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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of June, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following counsel of record:

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